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March 5, 2020

VIA ECF

The Honorable Lewis A. Kaplan
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**Re: *United States v. Randy Mena Contreras*
20 Cr. 113 (LAK)**

Dear Judge Kaplan:

Please recall that I represent Mr. Randy Mena Contreras in his defense of the above-referenced matter. With the consent of A.U.S.A. Daniel Nessim, I write to request an adjournment of the status conference currently scheduled for Tuesday, March 10, 2020, at 4:00 p.m. This is the first request for such an adjournment made by the defense.

The parties have completed most of the negotiations necessary to resolve this case without the need to conduct a trial. The defense is in receipt of a proposed plea agreement that must be renewed by Mr. Mena Contreras who is incarcerated in the Metropolitan Correctional Center (MCC). Because defense attorneys have been denied access to the MCC for one week to date and because of my litigation schedule tomorrow and Monday, I will be unable to see Mr. Mena Contreras to adequately review the plea agreement and make any counter-proposals to the Government prior to Tuesday's conference. It is for this reason that the defense requests that Your Honor adjourn the conference scheduled for Tuesday, March 10, 2020, for approximately three (3) weeks.

If Your Honor is inclined to grant this request, the defense has no objection to the exclusion of time under the Speedy Trial Act until the rescheduled conference date to enable Mr. Mena Contreras to consider the outstanding plea offer.

MEMO ENDORSEMENT

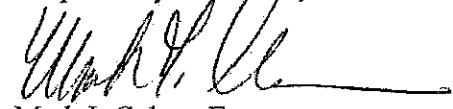
Application granted. The 3/10/2020 conference is adjourned until 3/31/2020 at 2:00 PM. Time from today to and including 3/31/2020 is excluded from speedy trial calculations in the interests of justice for the reasons given above.

So Ordered: _____

Hon. Lewis A. Kaplan, U.S.D.J., 3/10/2020

3/10/2020

Respectfully submitted,


Mark I. Cohen, Esq.